

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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NORTHERN STATES POWER COMPANY,

Plaintiff,

v.

Case No.: 10-cv-780

AEGIS INSURANCE SERVICES, INC. (a/k/a  
Associated Electric & Gas Insurance Services Limited),

Defendant and Third-Party Plaintiff,

v.

ADMIRAL INSURANCE COMPANY; ALLSTATE  
INSURANCE COMPANY (as successor-in-interest to Northbrook  
Excess & Surplus Insurance Company f/k/a as Northbrook  
Insurance Company); NORTHWEST NATIONAL INSURANCE  
COMPANY (as successor-in-interest to Bellefonte Insurance  
Company); CENTURY INDEMNITY COMPANY (as successor-  
in-interest to CIGNA Specialty Insurance Company f/k/a  
California Union Insurance Company); COLUMBIA CASUALTY  
INSURANCE COMPANY; CONTINENTAL INSURANCE  
COMPANY (as successor-in-interest to Harbor Insurance  
Company); INSCO INSURANCE GROUP; FAIRFAX  
FINANCIAL HOLDINGS LIMITED (as successor-in-interest to  
TIG as successor to International Surplus Lines Insurance  
Company); CERTAIN UNDERWRITERS AT LLOYD'S  
LONDON and CERTAIN LONDON MARKET INSURERS  
(including INSCO Ltd., Britamco, Ltd. AG 1830, CNA  
Reinsurance of London Limited, Compagnie D'Assurances  
Maritimes Aeriennes Et Terrestres, The Dominion Insurance Co.  
Ltd., Eisen Und Stahl Ruckversicherung A.G., Compagnie Euro-  
Belge De Reassurances, Assicurazioni Generali Spa (UK Branch),  
Hollandshe Vers. Van 1808 N.V., Companhia De Seguros Imperio  
S.A., Allianz International Insurance Co., Ltd., Storebrand  
Insurance Co., (UK) Ltd., Taisho Marine & Fire Insurance Co.  
(Europe) Ltd., The Tokio Marine & Fire Insurance Co. (UK) Ltd.,  
Royale Belge Incendie Reassurance S.A. D'Assurances, The  
Sumitomo Marine And Fire Insurance Co., Ltd., Turegum  
Insurance Co., Ltd., Unionamerica Insurance Co., Ltd., La Union  
Atlantique S.A., Continental Reinsurance Management Ltd., St.  
Katherine Insurance Co. PLC, Winterthur Swiss Insurance Co.,  
Yasuda Fire and Marine Insurance Co. (UK) Ltd., Compagnie  
Europeenne D'Assurances Industrielles S.A., La Agricola Sa De  
Seguros Y Reaseguros, Belge Industrielle A.N.M., Eurinco  
Allgemeine Versicherungs Aktiengesellschaft, Folksam  
International Insurance Co. (UK) Ltd., Hafez Insurance Co., PLAR

Pool); FAIRMONT SPECIALTY INSURANCE COMPANY (as successor-in-interest to Ranger Insurance Company); ST. PAUL MERCURY INSURANCE COMPANY, and ST. PAUL FIRE AND MARINE INSURANCE COMPANY,

Third-Party Defendants.

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**THIRD-PARTY DEFENDANT CENTURY INDEMNITY COMPANY'S  
RULE 26 INITIAL DISCLOSURES**

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Pursuant to Rule 26 of the Federal Rules of Civil Procedure, Century Indemnity Company, as successor to CIGNA Specialty Insurance Company, formerly known as California Union Insurance Company ("Century"), by its attorneys Cohn, Baughman & Martin and von Briesen & Roper, s.c., hereby makes its initial disclosures.

Century's disclosures represent a good faith effort to identify information it reasonably believes is relevant to the factual disputes alleged in the pleadings, as required by Rule 26(a)(1). By making these disclosures, Century does not represent that it is identifying every document, tangible thing, or witness possibly relevant to this lawsuit. Continuing investigation and discovery may alter this disclosure; therefore, Century submits this disclosure with the understanding that it does not in any way limit its discovery in this lawsuit or its right to supplement or amend this disclosure in the future. Nor does Century waive its right to object to the production of any document or tangible thing disclosed herein on the basis of any privilege, the work product immunity doctrine, relevancy, materiality, competency, undue burden, hearsay, or any other valid objection to its discoverability or to its use as evidence.

By making these disclosures, Century does not represent that any person, document, date of compilation, or tangible thing is in the possession, custody, or control of Century. An effort has been made to provide a comprehensive disclosure, which may mean that persons, documents,

dates of compilation, and tangible things that are not in possession, custody, or control of Century have been disclosed.

All the disclosures set forth below are made subject to these objections and qualifications.

**A. INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)(A).**

**i. Individuals Likely to Have Discoverable Information that Century May Use to Support its Claims or Defenses.**

The people identified below may have discoverable information that Century may use to support its claims or defenses:

1. Robert Russell  
Resolute Management Inc.  
United Plaza  
30 South 17<sup>th</sup> Street, Suite 700  
Philadelphia, PA 19103  
Phone: (267) 765-6438

Mr. Russell is likely to have information regarding the insurance policies issued by California Union Insurance Company (“California Union”) to Northern States Power Company (“NSP”), the insurance coverage claims that are the subject of this litigation, and the handling of the claims that are the subject of this litigation. Mr. Russell can be contacted through counsel.

Century adopts and discloses, as if set forth fully herein, individuals identified by any other parties in this action.

**ii. Documents Century May Use to Support its Claims or Defenses.**

1. Policies of insurance issued by California Union to NSP. Century has attached hereto as Bates Nos. CEN000001 through CEN000197 those portions of the California Union policies in Century’s possession. The California Union policies may be incomplete.

2. Century may also rely upon the pleadings, briefs and other materials filed in this action, the written discovery exchanged in this action, and the deposition testimony given in this action.

Century adopts and discloses, as though attached hereto, any documents disclosed by any other parties in this action.

**iii. Computation of each Category of Damages.**

Not applicable to Century at this time.

**iv. Insurance Agreements.**

See Century's response to Rule 26(a)(1)(ii) above.

Dated this 28<sup>th</sup> day of June, 2011.

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s/ Heidi L. Vogt

Heidi L. Vogt, SBN 1001318  
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